



Government

Box 2703, Whitehorse, Yukon Y1A 2C6

June 21, 2016

Ms. Marlene Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C.
U.S.A. 20554

Dear Ms. Dortch:

Re: Docket RM-11681 Petition for Rulemaking to Allocate the 1675-1680MHz Band for Terrestrial Mobile Use

The Government of Yukon would like to express its concern regarding the proposed changes to frequency allocation and the potential impact on the operation of the GOES data collection system.

The Department of Environment Water Resources Branch (WRB) operates a network of meteorological stations on behalf of the Government of Yukon and relies on the use of the GOES system to transmit real time weather data essential to flood and water supply forecasting. In addition, WRB is partnered with the Government of Canada's department of Environment to operate 79 real time hydrometric stations that provide water level and streamflow data for Yukon lakes and streams. This hydrometeorological station data is transmitted hourly via the GOES system and is used by several government agencies in Yukon as well as Alaska, British Columbia and Northwest Territories to monitor weather and hydrologic conditions. Obtaining these data in a timely fashion is critical for flood monitoring and forecasting purposes. These data are also used for many other purposes by a number of public and private organizations.

Any loss in the quality or reliability of telemetric transmissions from WRB's meteorological or hydrometric stations could severely impact the Government of Yukon's ability to monitor, predict and respond to flooding events, and, in turn provide timely warnings to its

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citizens. Although the allocation of broadband spectrum is a domestic affair, WRB urges the US Federal Communications Commission to consider alternate means of providing the petitioner with spectrum that will not impact the essential services offered by the GOES Data Collection System.

I would be happy to discuss this matter further. Please feel free to contact me at 867-667-5467 or the Director of the Water Resources Branch, Heather Jirousek, at 867-667-3145.

Sincerely,



Allan Koprowsky
Assistant Deputy Minister, Environmental Sustainability

cc: Dr. Alain Pietroniro, Executive Director, Hydrological Services, Environment Canada

Scott Lindsey, Alaska Regional Hydrologist, Alaska-Pacific Centre River Forecast
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